

REMARKS

Rejections

Rejections under 35 U.S.C. § 103(a)

Claims 2-8, 11-14, 16-21, and 23-26

Claims 2-9, 11-14, 16-21, and 23-26 stand rejected under 35 U.S.C. § 103(a) as being obvious over Stortz U.S. Patent No. 5,900,885 in view of by Priem et al., European Patent Application 0 525 986 (both previously cited). Applicant respectfully submits that this combination is improperly motivated and, furthermore, does not teach each and every element of the invention as claimed in claims 2-9, 11-14, 16-21, and 23-26.

Stortz discloses using either system memory or video memory to provide a composite video buffer. The composite video frame buffer comprises interleaved portions of the dedicated and incremental video buffers. The controller interleaves the contents of the dedicated and incremental video buffers to produce a single interlaced video frame. Because the controller interleaves the data, each buffer only contains data for part of the video frame. Thus, the controller uses both buffers to create a single video frame.

Priem discloses two double buffered display systems comprising a central processing unit (CPU) with two frame buffers, in which the first frame buffer is less expensive dynamic random access memory (DRAM) and the second frame buffer is more expensive video random access memory (VRAM). The first display system utilizes one controller for both buffers. In this system, the system writes a frame of data to the DRAM buffer and then copies this frames over to the VRAM buffer. The display is fed the frame stored in the VRAM buffer. However, by using one controller, this system suffers from “frame tearing,” because the system cannot keep up with the frame rate of the VRAM buffer (Priem, Col. 7, lines 38-53). To overcome the “frame tearing” problem, Priem discloses a second system with two controllers, one for each buffer. However, Priem does not disclose either frame buffer as being part of the general main system memory.

The combination of Stortz and Priem is improperly motivated because there is no motivation to combine Stortz with Priem. In particular, the Examiner proposes replacing Stortz’s buffers with Priem’s buffers. However, Priem explicitly teaches that a single

memory controller system cannot keep up with a frame rate required by the display. Thus, Priem teaches away from using a single controller system, such as Stortz. Because Priem discloses that single controller systems cannot keep up with a frame rate required by a display, there is no motivation to combine Priem with Stortz.

Nonetheless, assuming for the sake of argument that if the combination is properly motivated, the combination fails to teach or suggest each and every element as claimed. With regards to claims 2, 11, 16, and 23, Applicant claims a full frame of color data is written into the frame-preparation memory at frame rate, where the frame-preparation memory is mapped onto system memory. The Examiner admits that Stortz does not disclose this element and relies on Priem as disclosing it. In particular, the Examiner proposes replacing Stortz's buffers with Priem's buffers. While Priem discloses two frame buffers, Priem fails to teach or suggest a frame buffer mapped onto main memory.

Thus, the combination is improperly motivated and cannot be properly interpreted as disclosing claims 2, 11, 16, and 23 and claims 3-8, 12-14, 17-21, and 24-26 that depend on them. Therefore, the combination cannot render obvious Applicant's invention as claimed in claims 2-9, 11-14, 16-21, and 23-26, and Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

SUMMARY

Claims 2-9, 11-14, 16-21 and 23-26 are currently pending. In view of the foregoing remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Eric Replogle at (408) 720-8300 x7514.

Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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